

II. REMARKS

A. Summary of the Amendments

The present application now contains 47 claims.

Claims 31-42, 44, 46-49, 51, 64, 65, 67, 68, 70-80, 82, 84-87, and 93-101 are pending.

Claims 2-5 and 53-63 were previously cancelled without prejudice.

Claims 1 and 6-30 have been cancelled by the present amended without prejudice and for reasons unrelated to the prior art rejections raised by the Examiner. More specifically, the Applicant would like to indicate that the cancellation of claims 1 and 6-30 has been made in order to avoid redundancy in the claims and not in response to prior art rejections raised by the Examiner.

Claims 43, 45, 50, 52, 66, 69, 81, 83 and 88-92 have also been canceled for reasons unrelated to the prior art rejections raised by the Examiner. More specifically, the Applicant has canceled the aforementioned dependent claims in order to simplify the examination of the present application. The Applicant hopes that in doing so, the Examiner will be allowed to focus to a greater extent on the features appearing in the independent claims and that a resolution of this case will be more expeditiously obtained.

Claims 31, 64 and 67 have been amended to clarify the subject matter being claimed. More specifically, these claims have been amended to specify the following feature:

“the one of more filtering criteria being derived at least in part based on the information about the rail transportation service entered by the user;”

The applicant submits that the above-described amendment is amply supported by the specification as originally filed. More specifically, support can be found, amongst others, at p. 34 lines 22-31 and p. 35 lines 14-28 of the application as originally filed.

Claims 93-101 are new. Support for the subject matter of new claims 93-101 can be found throughout the specification and in particular at pp. 33-38 of the application as originally filed.

The Applicant submits that support for the amendments to the claims exists in the application as originally filed and that no new matter is being added to the present application through the present amendment.

B. Summary of the Rejection and Reply

In the Office Action, the Examiner has rejected claims 1, 6-52 and 64-92 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent publication No. 2002/0019759 (hereinafter referred to as Arunapuram).

Claims 1, 6-30, 43, 45, 50, 52, 66, 69, 81, 83 and 88-92 have been cancelled and as such the Examiner's rejections with respect to these claims are considered moot.

The Applicant respectfully traverses the above rejection with respect to claims 31-42, 44, 46-49, 51, 64, 65, 67, 68, 70-80, 82, 84-87 and submits that the subject matter of these claims distinguishes clearly and patentably over the cited reference, as discussed below.

However, for the purpose of clarifying the subject matter being claimed, the Applicant has amended independent claims 31, 64 and 67 to indicate that the one or more filtering criteria, based on which a basic pool of railcars is filtered, are derived at least in part based on information about a rail transportation service entered by the user.

In addition, the applicant also submits that the subject matter of new claims 93-101 distinguishes clearly and patentably over the cited reference, as discussed below.

Independent Claim 70

The Examiner's attention is directed to the following emphasized features of independent claim 70:

- 70) A computer readable storage medium containing a program element for execution by a CPU, said program element comprising:
- a) a first program component for causing a computer to deliver first information to a user, the first information prompting the user to enter at the computer information about a rail transportation service for shipment of goods by one or more railcars;
 - b) a second program component for receiving information about a basic pool of railcars, said second program component implementing a filter for filtering the basic pool of railcars, at least in part on the basis of the information about the rail transportation service entered by the user, to produce a filtered pool of railcars, said second program component causing the computer to deliver second information to the user, the second information prompting the user to select at the computer one or more railcars among the filtered pool of railcars for the shipment of goods;
 - c) a third program element for computing a price for the shipment of the goods at least in part on the basis of:
 - i) the rail transportation service;
 - ii) one or more characteristics of the railcars in the filtered pool of railcars selected by the user.

The Applicant submits that the subject matter of claim 70 is neither taught nor suggested by the documents cited by the Examiner. Without limiting the generality of the foregoing, the Applicant submits that Arunapuram does not teach or suggest the above-emphasized limitations of claim 70. More specifically, there is neither mention nor suggestion in the Arunapuram reference of a second program component implementing a filter for filtering the basic pool of railcars, at least in part on the basis of the information about the rail transportation service entered by the user, to produce a filtered pool of railcars, as claimed in claim 70.

Firstly, Arunapuram neither teaches nor suggests “a second program component

implementing a filter for filtering the basic pool of railcars [...] to produce a filtered pool of railcars”.

In the Office Action, the Examiner has given no indication as to where in Arunapuram the above-emphasized feature is taught or suggested. In fact, on p.3 in the section captioned “Response to Arguments”, the Examiner seems to indicate that the feature of a “second program component implementing a filter for filtering the basic pool of railcars [...] to produce a filtered pool of railcars” is not taught by Arunapuram. However, the Examiner argues that this feature is a mere automation of a set of parameters entered by the user and as such would be obvious. With respect, the Examiner seems to be arguing that, even if the above-described feature is not taught by Arunapuram, this reference nevertheless anticipates the subject matter of claim 70.

The Applicant respectfully disagrees.

The Applicant submits that the requirements for anticipation under 35 USC 102(e) have not been met. More specifically, as indicated in MPEP 2131, to anticipate a claim, **the reference must teach every element of the claim**. The Applicant submits that Arunapuram does not teach or suggest, either explicitly or inherently, a second program component implementing a filter for filtering the basic pool of railcars [...] to produce a filtered pool of railcar. As such, since Arunapuram does not teach, either explicitly or inherently, every element of claim 70, it cannot anticipate the subject matter of claim 70.

The Applicant also disagrees with the Examiner’s assessment that the feature of a “second program component implementing a filter for filtering the basic pool of railcars [...] to produce a filtered pool of railcars” is a mere automation of a set of parameters entered by the user. The Applicant would like to point out that the functionality of the second program element in claim 70 does not replace a function previously manually performed in Arunapuram or in the prior art. In fact, there is

nothing in Arunapuram that suggests anything resembling filtering a basic pool of railcars to produce a filtered pool of railcars either automatically or manually. This feature is completely absent from Arunapuram . As such a second program component implementing a filter for filtering the basic pool of railcars [...] to produce a filtered pool of railcars cannot be a “mere automation” since the function was not performed in the first place. In other words, for something to be considered a mere automation of a certain function, the certain function must have been taught or suggested in the first place. This is not the situation here since there is nothing in Arunapuram to indicate that the function of filtering a basic pool of railcars to produce a filtered pool of railcars was ever contemplated.

Conversely, the claimed invention requires a “*second program component implementing a filter for filtering the basic pool of railcars [...] to produce a filtered pool of railcars*”. The second program element allows a basic pool of railcars to be filtered to generate a filtered pool of railcars. The filtered pool of railcars is presented to the user for allowing the user to select a railcar from the filtered pool of railcars rather than from the basic pool of railcars. An advantage of presenting the user with a filtered pool of railcars, rather than with the basic pool of rail cars, is that it allows the user to be provided with a reduced number of possibilities for the railcars thereby facilitating the selection of one or more particular railcars. This advantage is described in the present patent application at least on p. 4 lines 1-3.

The Applicant further disagrees with the Examiner’s assessment that modifying Arunapuram to include the feature of a “*second program component implementing a filter for filtering the basic pool of railcars [...] to produce a filtered pool of railcars*” would be obvious.

The Applicant submits that, without the benefit of hindsight, there is no motivation whatsoever in the art to modify Arunapuram to include the above-described feature. The mere possibility that the use of this feature would enhance the efficiency and usability of the programs in Arunapuram, as argued by the Examiner on p.3, in no

way implies that a person skilled in the art would be motivated to make such a modification. With respect, the Examiner's argument merely describes an advantage derived from the claimed invention. With respect, presenting an advantage derived from the claimed invention as evidence that a person skilled in the art would have been motivated to modify the Arunapuram reference amounts to impermissible hindsight. *(The references must be viewed without the benefit of impermissible hindsight vision afforded by the claimed invention. (Hodosh v. Block Drug Co., Inc., 786 F.2d 1136, 1143 n.5, 229 USPQ 182, 187 n.5 (Fed. Cir. 1986).)*

Secondly, Arunapuram neither teaches nor suggests “second program component implementing a filter for filtering the basic pool of railcars, at least in part on the basis of the information about the rail transportation service entered by the user, to produce a filtered pool of railcars”.

There is nothing in Arunapuram that teaches or suggests filtering a basic pool of railcars based on information about a rail transportation service entered by the user. If the Examiner disagrees, the Applicant respectfully requests that he indicates where in the reference the above described feature is taught or suggested in Arunapuram.

In view of the foregoing, the Applicant respectfully submits that Arunapuram neither explicitly discloses nor implicitly suggests all of the limitations of independent claim 70. In addition, the Applicant submits that there is no motivation to modify Arunapuram in such a way as to result into the invention claimed in claim 70. Accordingly, the subject matter of claim 70 is believed to be novel and non-obvious over Arunapuram and the Examiner is respectfully requested to withdraw the rejection of claim 70 under 35 U.S.C. §102(e).

Dependent Claims 71- 80, 82, 84-87

Claims 71-80, 82, 84-87 are all either directly or indirectly dependent on claim 70 and therefore include all the limitations of that base claim and any intervening claims, including the features already shown to be absent from Arunapuram. Thus, for the same reasons as those set forth above in support of claim 70, the Examiner is requested to withdraw the rejection of claims 71-80, 82, 84-87.

Independent Claims 64 and 67

The Examiner's attention is directed to the following emphasized features of independent claims 64 and 67 (as amended):

- 64) A server system for computing a quote for a price for shipping goods by rail, said server system containing a program element for execution by a CPU, said program element comprising:
 - a) a first program component for causing a client system to deliver first information to a user, the first information prompting the user to enter at the client system information about a rail transportation service for shipment of goods by one or more railcars;
 - b) a second program component for receiving information about a basic pool of railcars, said second program component implementing a filter for filtering the basic pool of railcars based on one or more filtering criteria to produce a filtered pool of railcars, the one or more filtering criteria being derived at least in part based on the information about the rail transportation service entered by the user, said second program component causing the client system to deliver second information to the user, the second information prompting the user to select at the client system one or more railcars among the filtered pool of railcars for the shipment of goods;
 - c) a third program element for computing a price for the shipment of the goods at least in part on the basis of:
 - i) the rail transportation service;
 - ii) one or more characteristics of the railcars in the filtered pool of railcars selected by the user.

- 67) A client-server system for computing a quote for a price for shipping goods by rail, comprising:
 - a) a client system;
 - b) a server system, said client system and said server system operative to exchange messages over a data network;

- c) a first program component for execution on said server system for sending messages to said client system causing said client system to deliver information prompting the user to enter at the client system information about a rail transportation service for shipment of goods by one or more railcars;
- d) a second program component for execution on said server system for receiving information about a basic pool of railcars, said second program component implementing a filter for filtering the basic pool of railcars based on one or more filtering criteria to produce a filtered pool of railcars, the one or more filtering criteria being derived at least in part based on the information about the rail transportation service entered by the user, said second program component sending messages to said client system causing said client system to deliver information to the user prompting the user to select at said client system one or more railcars among the filtered pool of railcars for the shipment of goods;
- e) said client system being operative to send to said server system messages to communicate to said server the information about the rail transportation service entered by the user and the one or more rail cars selected by the user;
- f) a third program element executed at said server system for computing a price for the shipment of the goods at least in part on the basis of:
 - i) the rail transportation service;
 - ii) one or more characteristics of the railcars in the filtered pool of railcars selected by the user.

The Applicant submits that the subject matter of amended claims 64 and 67 is neither taught nor suggested by the documents cited by the Examiner. Without limiting the generality of the foregoing, the Applicant submits that, for the same reasons discussed above with regard to independent claim 70, Arunapuram does not explicitly disclose nor implicitly suggest the above-emphasized features of independent claims 64 and 67, as amended. Accordingly, the subject matter of claims 64 and 67, as amended, is believed to be novel and inventive over the cited prior art and, as such, in condition for allowance. The Examiner is therefore respectfully requested to withdraw the rejection of claims 64 and 67, as amended, under 35 U.S.C. §102(e).

Dependent Claims 65 and 68

Claims 65 and 68 are all either directly or indirectly dependent on one of claims 64 and 67 and therefore include all the limitations of the respective independent claim on which they depend, including the features already shown to be absent from Arunapuram. Thus, claims 65 and 68 are also believed to be novel and inventive over the cited prior art and, as such, in condition for allowance.

Independent Claim 31

The Examiner's attention is directed to the following emphasized features of independent claim 31:

- 31) A method for computing the price for shipping goods, comprising:
 - a) causing a computer to deliver first information to a user, the first information prompting the user to enter at the computer information about a rail transportation service for shipment of goods by one or more railcars;
 - b) receiving information about a basic pool of railcars and filtering the basic pool of railcars based on one or more filtering criteria to produce a filtered pool of railcars, the one or more filtering criteria being derived at least in part based on the information about the rail transportation service entered by the user;
 - c) causing the computer to deliver second information to the user, the second information prompting the user to select at the computer one or more railcars among the filtered pool of railcars for the shipment of goods;
 - d) computing a price for the shipment of the goods at least in part on the basis of:
 - i) the rail transportation service;
 - ii) one or more characteristics of the railcars in the filtered pool of railcars selected by the user.

The Applicant submits that the subject matter of amended claim 31 is neither taught nor suggested by the document cited by the Examiner. Without limiting the generality of the foregoing, the Applicant submits that, for the same reasons discussed above with regard to independent claim 70, Arunapuram does not explicitly disclose nor implicitly suggest the above-emphasized features of independent claim 31. Accordingly, the subject matter of claim 31 is believed to be novel and inventive over the cited prior art and, as such, in condition for allowance. The Examiner is therefore respectfully requested to withdraw the rejection of claim 31 under 35 U.S.C. §102(e).

Dependent Claims 32-42, 44, 46-49, 51

Claims 32-42, 44, 46-49, 51 are all either directly or indirectly dependent on claim 31 and therefore include all the limitations of independent claim 31, including the features already shown to be absent from Arunapuram. Thus, claims 32-42, 44, 46-49, 51 are also believed to be novel and inventive over the cited prior art and, as such, in condition for allowance.

New Independent Claim 93

The Examiner's attention is directed to the following emphasized features of new independent claim 93:

- 93) A method for allowing a railway transportation company to provide a customer with a quote for a shipping service involving shipping a commodity by rail, said method comprising:
- a) receiving at a network server that communicates with a customer's computer over a data network shipping information input by the customer on the customer's computer, the shipping information providing particulars of the shipping service for which a quote is desired, the shipping information including:
 - i) information that specifies an origin of a shipment of a commodity;
 - ii) information that specifies a destination of the shipment of the commodity;
 - b) processing with a software filter a basic pool of railcars to produce a filtered pool of railcars, the software filter implementing one or more filtering criteria derived from either one of:
 - i) data derived from the shipping information input by the customer that provides the shipping service for which the quote is desired;
 - ii) a customer profile residing in a customer profile database, where the customer profile is associated with the customer currently requesting the quote;
 - c) sending to the customer's computer information to allow the customer's computer to display to the customer the filtered pool of railcars and to allow the customer to specify one of more railcars to be used for shipping the commodity;
 - d) receiving at the network server railcar selection information specifying one or more railcars selected from the filtered pool of railcars by the customer at the customer's computer;
 - e) generating a price quote for shipping the commodity computed based on multiple factors including the railcar selection information;
 - f) sending information to the customer's computer to display the price quote to the customer;
 - g) in response to information received by the network server from the customer's computer indicating that the customer has accepted the price quote, performing the service of shipping the commodity at the quoted price with the railcars selected by the customer.

The Applicant submits that the subject matter of claim 93 is neither taught nor suggested by the document cited by the Examiner. Without limiting the generality of the foregoing, the Applicant submits that Arunapuram does not explicitly disclose or implicitly suggest the above-emphasized features of independent claim 93.

Firstly, for the same reasons discussed above with regard to independent claim 70, Arunapuram does not explicitly disclose nor implicitly suggest "processing with a software filter a basic pool of railcars to produce a filtered pool of railcars".

Secondly, since Arunapuram does not explicitly disclose nor implicitly suggest "processing with a software filter a basic pool of railcars to produce a filtered pool of railcars" it follows that Arunapuram cannot teach or suggest "sending to the customer's computer information to allow the customer's computer to display to the customer the filtered pool of railcars".

Thirdly, Arunapuram does not describe a method for allowing a railway transportation company to provide a customer with a quote for a shipping service for shipping a commodity by rail. Rather Arunapuram describes a system that allows a transportation manager to compute an expected cost for a transportation service. This expected cost is not a quote by a transportation company but rather is a price calculated for the benefit of the transportation manager in order to allow the latter to determine what he should expect to pay for the transportation service specified. It should be readily appreciated that an expected cost is not a quote provided by a transportation company.

More specifically, Arunapuram describes a system and method for assisting a transportation-planning manager in determining an optimal cost minimizing transportation plan for transporting goods between an origin and a destination. The system allows the transportation manager to provide, through an input mechanism, information about a desired transportation service. The system then computes an expected cost for the transportation service specified. Once the system determines the expected cost for a transportation service, the transportation manager can then send a tender to the carrier asking the carrier to either accept or reject the proposed request for transportation service.

Hence, the prices computed and provided in Arunapuram are not "price quotes" provided by a railway transportation company (or other carrier) but rather are expected costs for the transportation service. The costs that are computed by Arunapuram are based on rate tables and distance calculating programs such as Mile Maker and PC*Miler. See for example paragraph 0041 of the Arunapuram publication reproduced below:

[0041] Although not shown in FIG. 3, the problem-solver module 300 could also be provided with a distance interface. As will be readily appreciated by one of ordinary skill in the art, the rates quoted by carriers often depend upon the distance for which the order has to be transported. To this end, therefore, the problem-solver logic 301 will need a manner for determining the distance between an origination and destination point quoted for each order. Therefore, the PS module 300 could utilize a distance interface for electronic communication with a distance calculating program such as MileMaker or PC*Miler.

In Arunapuram, the prices that are generated are calculated based on **expected** rates and as such are not price quotes provided to a customer by a carrier. Another paragraph that supports this position is paragraph [0108] reproduced below *[our emphasis]*:

[0108] Accessorial charges are anticipated charges, like in-transit handling fees, fuel surcharges, and import/export charges. For each type of carrier and/or lane and/or location, accessorial charges can be defined in the PS database. After the appropriate rating is calculated for the shipment based upon the carrier, the carrier type, and any appropriate modifications required by roundtrip rating, radial rating, dimensional weighting, etc., the accessorial charges that apply are added on to the end to produce a final **"expected" cost**.

In Arunapuram, the carrier receives the expected cost and can either accept or decline the shipment request. In support of this see [0015], [0044]- [0047], [0049] and claims {#18, #36, #59, #61} of Arunapuram.

Conversely, claim 93 pertains to a method for allowing a railway transportation company to provide a customer with a quote for a shipping service involving shipping a commodity by rail. Even though this feature appears in the preamble of claim 93, it cannot be ignored since, when read in the context of the entire claim, it gives meaning

to the claim. (*Pitney Bowes, Inc. v. Hewlett-Packard Co.*, 182 F.3d 1298, 1305, 51 USPQ2d 1161, 1165-66 (Fed. Cir. 1999)). Also see MPEP 2111.02.

In light of the above, the Applicant submits that Arunapuram fails to teach or suggest the very purpose of the claimed invention which is to allow a railway transportation company to provide a customer with a quote for a shipping service involving shipping a commodity by rail.

Fourthly, Arunapuram does not teach or suggest in response to information received by the network server from the customer's computer indicating that the customer has accepted the price quote, performing the service of shipping the commodity at the quoted price with the railcars selected by the customer.

This feature is simply completely absent from Arunapuram. Moreover, there is no motivation for a person skilled in the art to modify Arunapuram to incorporate the aforementioned feature.

In light of the above, the Applicant submits that the subject matter of claim 93 is neither taught nor suggested by Arunapuram. As such, the Applicant respectfully submits that the subject matter of claim 93 is novel, inventive and in full condition for allowance.

Dependent claims 94-101

Claims 94-101 are all either directly or indirectly dependent on claim 93 and therefore include all the limitations of independent claim 93, including the feature already shown to be absent from Arunapuram. Thus, claims 94-101 are also believed to be novel, inventive and in condition for allowance.

Claims 94 and 98

Notwithstanding the foregoing argument, the Examiner's attention is respectfully directed to dependent claims 94 and 98, which are reproduced below for the reader's ease of reference:

94. A method as defined in claim 93, wherein **the particulars of the shipping service** for which the quote is desired include **railcar ownership information**, the railcar ownership information specifying the owner of one or more of the railcars to be used for shipping the commodity, the filtering criteria implemented by the software filter using the railcar ownership information to produce the filtered pool of railcars.

98. A method as defined in claim 93, wherein **the customer profile** includes **railcar ownerships information**, the railcar ownership information specifying the owner of the one or more of the railcars to be used for shipping the commodity, the filtering criteria implemented by the software filter using the railcar ownership information in producing the filtered pool of railcars.

The Applicant submits that the subject matter of claims 94 and 98 is neither taught nor suggested by Arunapuram. More specifically, Arunapuram neither teaches nor suggests making use of railcar ownership information to produce a filtered pool of railcars for display to a customer.

In fact, Arunapuram does not even contemplate the possibility of influencing the process of selecting of a railcar by specifying railcar ownership. As such, it follows that Arunapuram does not remotely contemplate influencing the process of selecting of a railcar by specifying railcar ownership through either one of the particulars of a shipping service or through a customer profile.

Accordingly, for the additional reasons described above, the Applicant respectfully submits that dependent claims 94 and 98 are novel and inventive over Arunapuram and, as such, in condition for allowance.

Claims 95 and 99

The Examiner's attention is also respectfully directed to dependent claims 95 and 99, which are reproduced below for the reader's ease of reference:

95. A method as defined in claim 94, wherein the basic pool of railcars includes railcars owned by different parties, **the filtering criteria operates to extract from the basic pool of railcars only railcars that are owned by the customer,** in generating the filtered pool of railcars.

99. A method as defined in claim 98, wherein the basic pool of railcars includes railcars owned by different parties, **the filtering criteria operates to extract from the basic pool of railcars only railcars that are owned by the customer,** in generating the filtered pool of railcars.

The Applicant submits that the subject matter of claims 95 and 99 is neither taught nor suggested by Arunapuram. More specifically, Arunapuram neither teaches nor suggests extracting from the basic pool of railcars only railcars that are owned by the customer requesting the price quote for the shipping service. This is simply completely absent from Arunapuram.

Accordingly, for the additional reasons described above, the Applicant respectfully submits that dependent claims 95 and 99 are novel and inventive over Arunapuram and, as such, in condition for allowance.

Claims 96 and 100

The Examiner's attention is also respectfully directed to dependent claims 96 and 100, which are reproduced below for the reader's ease of reference:

96. A method as defined in claim 93, wherein **the particulars of the shipping service** for which the quote is desired include commodity information, the commodity information specifying a type of commodity to be shipped, **the filtering criteria implemented by the software filter using the commodity information in producing the filtered pool of railcars.**

100. A method as defined in claim 93, wherein the **customer profile** includes commodity information, the commodity information specifying the commodity to be shipped, **the filtering criteria implemented by the software filter using the commodity information in producing the filtered pool of railcars.**

The Applicant submits that the subject matter of claims 96 and 100 is neither taught nor suggested by Arunapuram. More specifically, Arunapuram neither teaches nor suggests making use of the type of commodity to be shipped to produce a filtered pool of railcars for display to a customer.

Accordingly, for the additional reasons described above, the Applicant respectfully submits that dependent claims 96 and 100 are novel and inventive over Arunapuram and, as such, in condition for allowance.

Claims 97 and 101

The Examiner's attention is also respectfully directed to dependent claims 97 and 101, which are reproduced below for the reader's ease of reference:

97. A method as defined in claim 96, wherein the basic pool of railcars includes railcars suitable for different types commodities, **the filtering criteria operating to extract from the basic pool of railcars only railcars compatible with the type of commodity specified by the commodity information**, in generating the filtered pool of railcars.

101. A method as defined in claim 100, wherein the basic pool of railcars includes railcars suitable for different types commodities, **the filtering criteria operating to extract from the basic pool of railcars only railcars compatible with the commodity to be shipped**, in generating the filtered pool of railcars.

The Applicant submits that the subject matter of claims 97 and 101 is neither taught nor suggested by Arunapuram. More specifically, Arunapuram neither teaches nor suggests extracting from the basic pool of railcars only railcars compatible with the commodity to be shipped. Advantageously, this allows the customer to be presented with a filtered pool of railcars containing only railcars compatible with the commodity

to be shipped. This feature is simply completely absent from Arunapuram.

Accordingly, for the additional reasons described above, the Applicant respectfully submits that dependent claims 97 and 101 are novel and inventive over Arunapuram and, as such, in condition for allowance.

III. CONCLUSION

In view of the above, it is respectfully submitted that claims 31-42, 44, 46-49, 51, 64, 65, 67, 68, 70-80, 82, 84-87, and 93-101 are in condition for allowance. Reconsideration of the rejections is requested. Allowance of claims 31-42, 44, 46-49, 51, 64, 65, 67, 68, 70-80, 82, 84-87, and 93-101 at an early date is solicited.

If the claims of the application are not considered to be in full condition for allowance, for any reason, the Applicant respectfully requests the constructive assistance and suggestions of the Examiner in drafting one or more acceptable claims or in making constructive suggestions so that the application can be placed in allowable condition as soon as possible and without the need for further proceedings.

Respectfully submitted,

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